

1 PATRICK D. ROBBINS (CABN 152288)
 2 Acting United States Attorney
 3 PAMELA T. JOHANN (CABN 145558)
 4 Chief, Civil Division
 5 KELSEY J. HELLAND (CABN 298888)
 6 Assistant United States Attorney
 7 U.S. ATTORNEY'S OFFICE
 8 450 Golden Gate Avenue, Box 36055
 9 San Francisco, California 94102-3495
 10 (415) 436-7200
 11 ERIC HAMILTON
 12 Deputy Assistant Attorney General
 13 DIANE KELLEHER
 14 Branch Director
 15 CHRISTOPHER HALL
 16 Assistant Branch Director
 17 JAMES D. TODD, JR.
 18 Senior Trial Counsel
 19 YURI S. FUCHS
 20 Trial Attorney
 21 U.S. DEPARTMENT OF JUSTICE
 22 Civil Division, Federal Programs Branch
 23 P.O. Box 883
 24 Washington, DC 20044

Counsel for Defendants

**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

18
 19 AMERICAN FEDERATION OF
 GOVERNMENT EMPLOYEES, *et al.*
 20
 Plaintiffs,
 21
 v.
 22
 UNITED STATES OFFICE OF PERSONNEL
 MANAGEMENT, *et al.*,
 23
 Defendants.
 24
 25

Case No. 3:25-cv-1780-WHA

**STIPULATION AND [PROPOSED]
 ORDER GRANTING DEFENDANTS'
 UNOPPOSED ADMINISTRATIVE
 MOTION TO REMOVE INCORRECTLY
 FILED DOCUMENT (ECF NO. 272-19)**

STIPULATION

Pursuant to Civil Local Rule 7-12, the parties hereby stipulate and respectfully request that the Court grant Defendants' Administrative Motion to Remove Incorrectly Filed Document and remove the documents filed at ECF No. 272-19 from the public docket. As set forth in the Administrative Motion, the document to be removed inadvertently contained the PII of a third-party. A replacement document will be filed **has been filed at ECF No. 274-1**, and all parties agree to the removal of the previously filed version.

1 Dated: November 24, 2025

2 s/ Eileen B. Goldsmith

3 Scott A. Kronland (SBN 171693)
 4 Stacey M. Leyton (SBN 203827)
 5 Eileen B. Goldsmith (SBN 218029)
 6 Danielle E. Leonard (SBN 218201)
 7 Robin S. Tholin (SBN 344845)
 8 James Baltzer (SBN 332232)
 9 ALTSCHULER BERZON LLP
 10 177 Post St., Suite 300
 11 San Francisco, CA 94108

12 *Attorneys for Plaintiff Organizations*

13 s/ Rushab Sanghvi

14 Rushab Sanghvi (SBN 302809)
 15 AMERICAN FEDERATION OF
 16 GOVERNMENT EMPLOYEES
 17 80 F Street, NW
 18 Washington, DC 20001

19 *Attorney for Plaintiff American Federation
 20 of Government Employees*

21 s/ Teague Paterson

22 Teague Paterson (SBN 226659)
 23 Matthew Blumin (*pro hac vice*)
 24 AMERICAN FEDERATION OF STATE,
 25 COUNTY, AND MUNICIPAL
 26 EMPLOYEES
 27 1625 L Street, N.W.
 28 Washington, D.C. 20036

29 *Attorneys for Plaintiff American Federation
 30 of State County and Municipal Employees*

31 s/ Tera M. Heintz

32 Tera M. Heintz (SBN 241414)
 33 Cristina Sepe (SBN 308023)
 34 Cynthia Alexander, WA Bar No. 46019 (*pro
 35 hac vice*)
 36 Deputy Solicitors General
 37 OFFICE OF THE WASHINGTON
 38 STATE ATTORNEY GENERAL
 39 800 Fifth Avenue, Suite 2000
 40 Seattle, WA 98104

41 *Attorneys for Plaintiff State of Washington*

42 CRAIG H. MISSAKIAN (CABN 125202)
 43 Acting United States Attorney
 44 PAMELA T. JOHANN (CABN 145558)
 45 Chief, Civil Division
 46 KELSEY J. HELLAND (CABN 298888)
 47 Assistant United States Attorney
 48 U.S. ATTORNEY'S OFFICE
 49 450 Golden Gate Avenue, Box 36055
 50 San Francisco, California 94102-3495

51 ERIC HAMILTON

52 Deputy Assistant Attorney General
 53 DIANE KELLEHER
 54 Branch Director
 55 CHRISTOPHER HALL
 56 Assistant Branch Director

57 s/ James D. Todd, Jr.

58 JAMES D. TODD, JR.
 59 Senior Trial Counsel
 60 U.S. DEPARTMENT OF JUSTICE
 61 Civil Division, Federal Programs Branch
 62 P.O. Box 883
 63 Washington, DC 20044

64 *Counsel for Defendants*

1 **[PROPOSED] ORDER**
2
3
4
5
6

Pursuant to Stipulation, it is so ORDERED.

7 DATED: December 30, 2025.
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

